



## North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor  
Dee Freeman, Secretary

October 21, 2010

Mr. Charles Brushwood  
Solid Waste Director  
Davidson County Integrated Solid Waste Management  
1242 Old U.S. Highway 29  
Thomasville, NC 27360

Re: *Request to Modify Groundwater Monitoring Network*  
Davidson County Closed Holly Grove Landfill, Permit #29-02

Dear Mr. Brushwood:

The Solid Waste Section has completed a review of the *Request to Modify Groundwater Monitoring Network* dated June 30, 2010 (Doc 11570) for the closed and unlined Davidson County Holly Grove Landfill and submitted on behalf of Davidson County by RSG.

The four requests include the following:

1. Removal of well MW-3a from the groundwater monitoring network due to lack of detected constituents in this area for over five years;
2. Removal of well MW-5 from the groundwater monitoring network. This well has consistently had no detectable concentrations of Appendix I constituents for over five years;
3. Removal of well MW-6 from the groundwater monitoring network due to its proximal location to the waste, lack of concentrations of constituents above the 2L groundwater standard and location of well MW-16 further downgradient from the waste in this area. Additionally, MW-1a will remain in the groundwater monitoring network and this well is located immediately adjacent to MW-6.
4. Reduction to annual groundwater monitoring for well MW-10 due to their consistent lack of detected impact from the landfill. Should concentrations of Appendix I constituents be detected above the 2L groundwater standard, these wells will return to semi-annual monitoring.

If these modifications are approved, RSG will submit a revised Water Quality Monitoring Plan for the facility that incorporates these changes.

As a result, the Solid Waste Section provides the following responses to the four requests:

1. The request to remove MW-3a from the groundwater monitoring well network is denied due to the historical and recent metal and volatile organic compound detections and the recent exceedances of vinyl chloride in 2008.
2. The request to remove MW-5 from the groundwater monitoring network is denied at this time due to the historical and recent metal and volatile organic compound detections, its downgradient location, and its close proximity to the property line, however, the frequency of MW-5 may be reduced to annual groundwater monitoring. If concentrations of Appendix I constituents are detected above the groundwater standards, please immediately return to semiannual groundwater monitoring.

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3. The request to remove MW-6 from the groundwater monitoring network is approved as described. Please continue to collect groundwater elevations from this well on a semiannual basis.
4. The request to reduce the frequency of MW-10 to annual groundwater monitoring is approved as described. If concentrations of Appendix I constituents are detected above the groundwater standards, please immediately return to semiannual groundwater monitoring.

Please also submit a revised Water Quality Monitoring Plan (WQMP) incorporating the above changes. If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or by email at [jaclynne.drummond@ncdenr.gov](mailto:jaclynne.drummond@ncdenr.gov).

Sincerely,



Jaclynne Drummond  
Hydrogeologist  
Environmental Compliance  
Solid Waste Section

cc sent via email:      Mark Poindexter, Field Operations Supervisor  
                                 Jason Watkins, Central District Supervisor  
                                 Hugh Jernigan, Environmental Senior Specialist